

King County's comments from 6/24/09 mtg

Part	WAC	Section/subsection	Comment
PART VI Use Based standards	WAC 173-219-500	2. minimum class requirements	Can you clarify in rule or guidance any requirements for use of reclaimed water for firefighting?
	WAC 173-219-560	3. Additional nutrient requirements a. phosphorus and nitrogen	You are recommending N and/or p removal for recreational impoundments to minimize algal growth. Do recreational impoundments refer to golf course irrigation ponds as well? They prefer the nutrients in the reclaimed water since it reduces fertilizer use. It is a positive selling point for RW and I would hate to take it out just for aesthetics when the nutrients save the golf courses money. In our research, it could save a King County golf course 1/3-1/2 its fertilizer use. Many of the golf course ponds have bubbler or sprinklers in their water features to reduce algal growth. You need to clarify recreational impoundments and maybe put something in guidance about when nutrient removal may be recommended and when it is not advisable.
PART V General Requirements for storage, distribution and use version 1.1	WAC 173-219-420	1. Maintenance of chlorine residual	Detectable chlorine level needs definition In subsection a- what about storage in tanks?
		2. labeling	Change warn to advise
		4. cross connection	Section c- Protection needs to be commensurate with risk- I agree with Craig Riley on this. Class A is considered low risk. Section e-not consistent with wording for mmultifamily

			plumbing uses in section 6
	WAC 173-219-430	Distribution by trucks	2.a. delete the last part of sentence- “ and the tank truck is contracted..... Need to clarify in guidance that this relates to POTABLE uses. If the truck is not used for potable use, this does not apply.
	WAC 173-219-450	General use area requirements	4. change warn to advise
	WAC 173-219-460	Labeling of RW	Section 1 works easily for new installations of irrigation systems. Need to be clear about retrofit to existing systems. The cost of converting one course in King County which has 3200 sprinkler heads all at once is high. A conversion plan should be developed and submitted for approval. Ecology stated that the current wording does allow flexibility but the individual regional offices interpret wording differently. Guidance is needed to consistently apply to retrofit situations.
Schedule 6/17/09 version			The water rights issue schedule needs to show a review period for the RAC of individual products and the total package of work by the WR group. This integration is needed. The RAC schedule needs to show it’s review of the Wrights products individually and in total as well.
PART II Submittals	WAC 173-219-120	Requirements to submit	Need some clarification in guidance about which components are needed for which permits. In part 1- construction specs and plans may come after you get the rw permit. Guidance needs to be clear that the draft o&m plan is more than a table of contents but less than a full draft plan.
	WAC 173-219-	Engineering report	The questions ask “ Should we address requirements for

	160		financial assistance edibility?” Please put it in guidance. When we were talking about the requirements for the RW feasibility study months ago, it was unclear what was required if you have financial assistance and what was required if you did not. Guidance would be a good place to clarify these requirements.
PART III	WAC 173 219 200	Permits	Please add guidance on which permits apply to what type of situations.
	WAC 219 280		<p>The RAC discussed the issue of whether the permit needs to include an obligation to supply backup water if the RW permit is revoked or suspended. The concern was the impact on water suppliers.</p> <p>The RW permit should not specific back up water obligations. The backup supply is a negotiated item between the purveyor of RW and the enduser/distributor. It is usually incued in any agreements between the parties. Reclaimed water is an interruptable source of water and the flexibility to deal with interruptions does not need to clarified in any RW permits. Guidance could include recommendations for planning backup water sources and how to handle it in agreements etc but it does not need to be in the rule.</p>
	WAC 173-219-290	Permit conditions	Subsection c- we need to explore the use of the terms” industrial and toxic” discharges. Next meeting we can discuss this further